



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
NEW YORK, NY 10281-1022

January 28, 2022

By ECF

Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

MEMO ENDORSED

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,
12-CV-6421 (KMK)

Dear Judge Karas:

I write to confirm that the United States Securities and Exchange Commission ("Commission") seeks Defendant Edward Bronson's ("Bronson") continued incarceration. DE 318. This afternoon, after Bronson reported to the US Marshals Service, his counsel provided proof of funds for three payments. DE 319. These records reflect three transfers that reference the SEC. The first is a \$300,000 payment initiated on January 25, 2022, which the Commission has received. The other two payments, \$380,000 and \$20,000, initiated today, remain pending. Until these payments clear and the Commission is actually paid, Bronson remains in violation of the Court Order. Here, the Commission is particularly concerned because Bronson has twice before bounced payments. Thus, until the funds clear, the Commission seeks Bronson's continued incarceration.

Respectfully submitted,

Maureen Peyton King

Mr. Bronson has repeatedly and brazenly flouted the Court's multiple orders to pay disgorgement over the past several years. Part of his effort to ignore and circumvent the Court's orders has involved perjury from the witness stand and part of this effort has been to wait until final warnings were issued and then engage in the mirage of making payments that ultimately bounced. Now, on the day that he was to report to the Marshals Service by noon, Mr. Bronson has attempted to make payment, but the SEC cannot verify whether there are sufficient funds for these payments. Given the clear pattern of Mr. Bronson's contempt, there is no reason to give Mr. Bronson the benefit of the doubt. These payments were to be made well before today, and if Mr. Bronson wanted to avoid the consequences of his contempt, he should have made payment earlier. Therefore, Mr. Bronson is to be immediately taken into the custody of the US Marshals Service and imprisoned until further order of the Court.

So Ordered.

1/28/22